

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

PLANNED PARENTHOOD SOUTH	)	
ATLANTIC, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
JOSHUA STEIN, <i>et al.</i> ,	)	Case No. 1:23-cv-00480-CCE-LPA
	)	
Defendants,	)	
	)	
and	)	
	)	
PHILIP E. BERGER, <i>et al.</i> ,	)	
	)	
Intervenor-Defendants.	)	

**LOCAL RULE 5.5 REPORT FOR THE FILING OF SEALED DOCUMENTS**

1. Conference: The parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

2. Default: The parties certify that, assuming all parties agree to abide by the joint protective agreement described below, few, if any, documents will be filed under seal. The parties agree to use the default procedures of LR 5.4(c). In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and

confer with the party claiming confidentiality as soon as practicable, but at least two (2) days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by LR 5.4(c)(3) within 14 days of the motion to seal.

3. Other relevant information: Because written discovery during the expedited discovery period involved the disclosure of confidential and proprietary materials, the parties have entered into a joint protective agreement governing the confidentiality of certain documents exchanged during discovery.

Date: September 15, 2023

Respectfully submitted,

FOR ALL PLAINTIFFS:

/s/ Kristi Graunke

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## **CERTIFICATE OF SERVICE**

I hereby certify that, on September 15, 2023, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which served notice of this electronic filing to all counsel of record.

/s/ Hannah Swanson

Hannah Swanson\*

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*\*Special appearance filed*